

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JEFFREY TODD, #1803650

Plaintiff,

v.

REGINALD HAWKINS, et al.,

Defendants.

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CIVIL ACTION NO. W-16-CV-288-RP

Defendants' Supplemental Expert Witness List and Disclosures

Pursuant to the Court's scheduling order [#50] and Federal Rule of Civil Procedure 26, Defendants Marrero, Hawkins, and Craighead serve the following supplemental expert disclosures. Defendants reserve the right to supplement or amend these disclosures as necessary.

Defendants' Non-Retained Experts

1. Danny Washington, LVN
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Mr. Washington may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and Mr. Washington's observations and involvement in Plaintiff's medical treatment for such injuries. Additional support for Mr. Washington's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

2. Courtney A. Chung, PA
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Ms. Chung may testify as to her opinions regarding the nature and causes of Plaintiff's injuries, and Ms. Chung's observations and involvement in Plaintiff's medical treatment for such injuries. Additional support for Ms. Chung's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

3. Alam Shanawar, MD
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Dr. Shanawar may testify as to her opinions regarding the nature and causes of Plaintiff's injuries, and Dr. Shanawar's observations and involvement in Plaintiff's medical treatment for such injuries. Dr. Shanawar may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Dr. Shanawar's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

4. Milton O. Togo, PA-C
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Mr. Togo may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and Mr. Togo's observations and involvement in Plaintiff's medical treatment for such injuries. Mr. Togo may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Mr. Togo's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

5. Theodore Nasiotis, PA
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Mr. Nasiotis may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and Mr. Nasiotis's observations and involvement in Plaintiff's medical treatment for such injuries. Mr. Nasiotis may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Mr. Nasiotis's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

6. Douglas E. Greene, MD
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Dr. Greene may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and Dr. Greene's observations and involvement in Plaintiff's medical treatment for such injuries. Dr.

Greene may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Dr. Greene's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

7. Glenn M. Garcia, MD
UTMB Health – Department of Radiology
1005 Harborside Dr.
Galveston, TX 77555
(409) 772-7150

Dr. Garcia may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and Dr. Garcia's observations and involvement in Plaintiff's medical treatment for such injuries. Dr. Garcia may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Dr. Garcia's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

8. Hazel J. Temmen, PT
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Ms. Temmen may testify as to her opinions regarding the nature and causes of Plaintiff's injuries, and Ms. Temmen's observations and involvement in Plaintiff's medical treatment for such injuries. Ms. Temmen may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Ms. Temmen's opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

9. **Jarome Barnes, RN**
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Nurse Barnes may testify as to his opinions regarding the nature and causes of Plaintiff's injuries, and his observations and involvement in Plaintiff's medical treatment for such injuries. Nurse Barnes may also testify as to the prognosis involved in Plaintiff's injuries, including the likelihood of future pain, limitations, and treatment related to such injuries. Additional support for Nurse Barnes' opinions and testimony may be found in the medical records produced in this case, including documents labeled TODD - 295 to TODD - 763.

10. **Captain Richard Harvey**
TDCJ Hughes Unit
3201 FM 929

Gatesville, TX 76528
(254) 865-6663

Captain Harvey may testify as to his knowledge of the events giving rise to the litigation and his review of the use of force report. He will testify that the Defendants' actions were taken within the general guidelines and procedures for the Texas Department of Criminal Justice.

11. Major Anthony Patrick
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Major Patrick may testify as to his knowledge of the events giving rise to the litigation and his review of the use of force report. He will testify that the Defendants' actions were taken within the general guidelines and procedures for the Texas Department of Criminal Justice.

12. Assistant Warden Bruce Armstrong
TDCJ Hughes Unit
3201 FM 929
Gatesville, TX 76528
(254) 865-6663

Warden Armstrong may testify as to his knowledge of the events giving rise to the litigation and his review of the use of force report. He will testify that the Defendants' actions were taken within the general guidelines and procedures for the Texas Department of Criminal Justice.

Respectfully submitted,

KEN PAXTON
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LACEY E. MASE
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/s/ C Daniel DiLizia

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**ATTORNEYS FOR DEFENDANTS
HAWKINS, CRAIGHEAD AND MARRERO**

NOTICE OF ELECTRONIC FILING

I, **C DANIEL DILIZIA**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing a true copy of the above and foregoing, in accordance with the Electronic Case Files System of the Western District of Texas on September 5, 2017.

/s/ C Daniel DiLizia
C DANIEL DILIZIA
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **C DANIEL DILIZIA**, Assistant Attorney General of Texas, certify that **Defendants' Supplemental Expert Witness List and Disclosures** has been served via email on September 7, 2017, addressed to:

Karson K. Thompson
Beck Redden, LLP
515 Congress Avenue, Suite 1900
Austin, TX 78701
(512) 900-3218

Via Email: kthompson@beckredden.com

/s/ C Daniel DiLizia
C DANIEL DILIZIA
Assistant Attorney General